

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

JOHN BRDA,
GEORGIOS PALIKARAS,

Defendants.

Civ. Action No. 4:24-cv-1048-SDJ

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO
DEFENDANT JOHN BRDA’S MOTION TO EXCLUDE IMPROPERLY OBTAINED
EVIDENCE**

Plaintiff Securities and Exchange Commission (“SEC”) files this Unopposed Motion to Extend Time to Respond to the Motion to Exclude Improperly Obtained Evidence (ECF No. 54, the “**Motion to Exclude**”) filed by Defendant John Brda (“**Brda**”). The SEC respectfully requests a one-week extension on its deadline to respond to the Motion to Exclude, which would extend the SEC’s deadline to **March 19, 2025**. In support, the SEC respectfully shows as follows:

1. Brda filed his Motion to Exclude on February 26, 2025. Under Local Rule CV-7(e), the SEC’s deadline to respond is fourteen days after service of the Motion to Exclude. Thus, the SEC’s current deadline to file a response to the Motion to Exclude is March 12, 2025.

2. The Motion to Exclude seeks extraordinary relief relating to the SEC’s ongoing, non-public investigation into possible securities law violations arising from events that occurred more than a year after the relevant events and securities law violations alleged in this case.

3. Since the Motion to Exclude was filed, the SEC’s undersigned counsel has had minimal time to work on a response to the Motion to Exclude due to other work commitments,

including (1) drafting the SEC's 50-page Omnibus Response in Opposition to Defendants' Motion to Dismiss [ECF No. 55] filed February 28, 2025, (2) working with Defendants' counsel to draft and confer on issues concerning the Joint Report on Rule 26(f) Conference [ECF No. 56] filed February 28, 2025, and (3) working on other cases, including taking the deposition of a defendant in another matter on March 5, 2025.

4. For good cause and to permit sufficient time for the SEC to adequately respond to the extraordinary relief requested, the SEC respectfully asks the Court to grant a one-week extension of the SEC's deadline to respond to Brda's Motion to Exclude, from March 12, 2025 to March 19, 2025.

5. The SEC has conferred with Brda's counsel regarding the relief requested herein, and Brda does not oppose the one-week extension requested.

PRAYER FOR RELIEF

For the reasons set forth above, the SEC respectfully requests that the Court grant this Unopposed Motion to Extend Time and extend the SEC's deadline to file a response in opposition to Brda's Motion to Exclude to March 19, 2025.

Dated: March 6, 2025

Respectfully submitted,

/s/ Patrick Disbennett
Patrick Disbennett
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

The undersigned certifies that Plaintiff's counsel has conferred with Defendant John Brda's counsel regarding the relief requested herein relating to Brda's Motion to Exclude, and Brda's counsel has indicated Brda is UNOPPOSED.

/s/ Patrick Disbennett
Patrick Disbennett

CERTIFICATE OF SERVICE

I certify that on March 6, 2025, I caused the foregoing document to be electronically filed with the Clerk of the U.S. District Court for the Eastern District of Texas, Sherman Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Patrick Disbennett
Patrick Disbennett